

FILED

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

**APR 27 2022
U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDRE PEARSON, a/k/a "LUH HALF,"

Defendant.

4:22CR229 JAR/JMB

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Jennifer Szczucinski, Assistant United States Attorneys for said District, and moves the Court to order the Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of the Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. The Defendant is charged with Conspiracy to Distribute More Than 40 grams of Fentanyl, in violation of 21 U.S.C. § 846 and 841(a) and four counts of Distribution of Fentanyl, in violation of Title 21, U.S.C. § 841(a). Offenses charged pursuant to 21 U.S.C. § 841(a) and 846 carry a maximum twenty years imprisonment as prescribed under Title 21. Accordingly, a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the Defendant as required and the safety of any other person and the community.

2. An investigation initiated by the St. Louis Metropolitan Police Department with

assistance from the Bureau of Alcohol, Tobacco, Firearms and Explosives revealed that the Defendant, together with the co-defendants and others known and unknown, conspired to distribute and did, in fact, distribute, fentanyl throughout the Saint Louis area. The Defendant and co-Defendant Davante Lindsey are the leaders of an organization known as the 55 Boyz. The 55 Boyz is responsible for drug trafficking and gun violence throughout Saint Louis, but predominantly along the Interstate 55 corridor. In this case, the Defendant directed multiple sales of fentanyl, advertised fentanyl sales, and maintains premises used for drug distribution.

3. The Defendant's criminal history reflects that he has prior felony convictions including, but not limited to, the following:

- 1422-CR03947, *State of Missouri v. Andre Pearson*
Guilty Plea/Sentence Date: February 17, 2015
Count One: Unlawful Use of a Weapon
Sentence: SIS, 5 years probation

4. On March 28, 2022, St. Louis County Police Department officers attempted to pull the Defendant over for traffic violations. Rather than stop, the Defendant engaged police in a high speed pursuit, even after officers utilized a tire deflation device on the vehicle the Defendant was driving. The Defendant also has a history of arrests with narcotics and weapons. In 2021, the Defendant was arrested in possession of a firearm and a large quantity of marijuana.

5. The Defendant has significant ties outside the district and appears to travel often. The Defendant frequently travels to Illinois and appears to frequently travel to the Atlanta, Georgia area. The Defendant appears to have significant cash assets that would permit easy flight from the district without the ability to closely track the Defendant. There is a serious risk that the Defendant will flee, given the Defendant's assets, history of flight from law enforcement, and connections outside the district. As such, the United States believes there are no conditions or combination of conditions that will reasonably assure the Defendant's appearance as required.

6. Further, the Defendant's criminal history and the nature and circumstances of the offense charged, reflect that there is a serious danger to the community that would be posed by the defendant's release.

WHEREFORE, the United States requests this Court to order the Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of the Defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Jennifer Szczucinski
JENNIFER SZCZUCINSKI, #56906MO
Assistant United States Attorney